



2021 Modern Slavery Statement

Foundations for the future



Reporting Entities

This is a joint Modern Slavery Statement, made pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**), for the financial year ended 31 December 2021, covering the following entities that meet the definition of reporting entities in the Act:

- Ampol Limited (ACN 004201307)
- Ampol Australia Petroleum Pty Ltd (ACN 000032128)
- Ampol Retail Pty Ltd (ACN 000175342)
- Ampol Petroleum Distributors Pty Ltd (ACN 005632860)

This Modern Slavery Statement identifies the steps taken in relation to modern slavery by the reporting entities, and the entities wholly-owned or controlled by them (together, for the purposes of this Statement, "Ampol Group").

Throughout this Statement terms such as Ampol, Ampol Australia, and 'we' have the same meaning as Ampol Group, unless the context requires otherwise.

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Message from the Managing Director and CEO

We take our responsibility for our communities seriously

I'm pleased to present Ampol's Modern Slavery Statement for 2021, outlining the progress we have made to identify and mitigate modern slavery risks within our supply chains.

2021 was another challenging year, with prolonged lockdowns across the country and increased health and safety protocols affecting our people, partners and suppliers. Despite these challenges, we remained focused on delivering on our goal to eradicate modern slavery within our sphere of influence, and made some strong progress against commitments set out in our first Modern Slavery Statement which we issued last year.

Eradicating modern slavery is not just a compliance issue for Ampol, it is a moral imperative. With more than 40 million people enslaved globally, and many exploited in the private sector through multi-layered supply chains, it is vital that large organisations such as ours take immediate and significant steps to protect human rights.

As Australia's leading transport energy distributor and retailer, we know that we have a responsibility to operate sustainably and to make a positive impact on our communities – we take this responsibility seriously. It is also what our customers, investors, employees, peers and communities expect of us, and we are committed to meeting these expectations.

In 2021, we continued our work to deepen our understanding of modern slavery risks within our business, undertaking deep dives in areas

identified as higher risk and outlining actions required to address these risks. Importantly, we continued our engagement with our supplier base through supplier questionnaires and direct engagement. In 2021, more than 50% of our supply base, when measured by spend, completed the Supplier Code of Conduct questionnaire, with more than 80 desktop verification assessments also completed. Internally, we continued our work to increase awareness and capability within our business relating to modern slavery risks, delivering training to functional areas identified as higher risk.

Beyond our direct employees, partners and suppliers, we are also taking a risk-based approach and engaging third parties, such as our customers and industry peers, to identify collaboration and shared learning opportunities.

At Ampol, our purpose is *Powering better journeys, today and tomorrow*. This means not only powering better journeys for our customers on the road, but also for the people and communities that are affected by our operations.

I am proud of the steps we took in 2021 and look forward to continuing this important work in 2022.



Matthew Halliday
Managing Director and CEO



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Our approach to modern slavery

Our approach to modern slavery is guided by our robust risk management framework and is underpinned by our values

Ampol's approach to modern slavery is underpinned by the Ampol Values and the Ampol Risk Management Framework (ARMF), is based on the United Nations Guiding Principles on Business and Human Rights and is collaborative in nature.

Ampol Risk Management Framework

Ampol's ARMF is an enterprise risk management framework, supported by a governance structure, designed to integrate risk management into the overall culture of the organisation.

Risks identified through the ARMF are assessed on a regular basis by management, and material risks are regularly reported to the Board and its committees. These reports include the status and effectiveness of control measures relating to each material risk.

Further information on Ampol's approach to risk management is outlined in our Corporate Governance Statement, which is available on our website.

Modern slavery risk is recognised by the ARMF as a risk source, and the effectiveness of control measures relating to it are assessed regularly. This Statement describes the steps taken by Ampol to assess and address modern slavery risks.

During 2021, Ampol implemented a specific modern slavery procurement risk assessment and mitigation procedure to assist Ampol employees and contractors to evaluate supply chain risks. The procedure provides a framework for assessing and addressing modern slavery risks when purchasing goods and services.

United Nations Guiding Principles on Business and Human Rights

Drawing on the United Nations Guiding Principles on Business and Human Rights, we recognise our responsibility to avoid causing or contributing to modern slavery through our activities. We also recognise our responsibility to mitigate modern slavery risks that are otherwise linked to us, including through our supply chains. This responsibility requires us to have clear policies, due diligence and remediation processes. Recognising we can't tackle all potential modern slavery risks at once, we have prioritised our mitigation activities, considering the severity of the risk and our leverage and ability to influence it. We also recognise the need to continually reassess our modern slavery response program, improve on it and show progress each year.

Collaborative approach

Our preference is to engage, collaborate and work with others to address modern slavery and bring about meaningful change. We recognise that collaborating broadens our reach and will allow us to educate, share knowledge and learn from others, ultimately leading to better management of modern slavery risks both by Ampol and business generally. Several modern slavery working groups have been initiated throughout the business to ensure we continue to foster new ideas and to monitor and review the effectiveness of processes adopted to mitigate modern slavery risks.

Ampol Values

The Ampol Values underpin everything we do. In particular, the Ampol Value of *Never stop caring* encourages us to always do the right thing and have a positive impact on the communities and economies in which we operate. Ensuring that no modern slavery exists within our operations and supply chains is a critical action that supports this value.



Connect to win

We collaborate as an integrated business to drive growth.



Find new ways

We innovate to deliver positive outcomes.



Own it

We make bold decisions and are accountable for the outcomes.



Make a difference for customers

We are connected to our customers and solve their changing needs.



Never stop caring

We keep safety first and make a positive contribution to those around us.



Our structure

Ampol Limited is an independent Australian company and the nation's leader in transport fuels

Simplified structure chart



- Reporting entities (as defined in the Act) making this joint Modern Slavery Statement
- Owned and controlled entities covered by this joint Modern Slavery Statement
- Additional investments not covered by this joint Modern Slavery Statement

Ampol Limited and the Ampol Group

Ampol Limited is the Australian Securities Exchange (ASX) listed parent company of the Ampol Group, comprising approximately 81 controlled entities. For a full list of controlled entities, see Ampol's 2021 Annual Report (Note F1 to the Financial Statements).

Ampol Limited is incorporated in Australia with its registered office at 29–33 Bourke Road, Alexandria, NSW 2015.

Subsidiary reporting entities

Ampol Australia Petroleum Pty Ltd is a wholly-owned subsidiary of Ampol Limited and the main operating entity for the Ampol Group.

Ampol Retail Pty Ltd is a wholly-owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's Convenience Retail business.

Ampol Petroleum Distributors Pty Ltd is a wholly-owned subsidiary of Ampol Australia Petroleum Pty Ltd that operates Ampol's national depot network and associated truck fleet.

All three subsidiary reporting entities are incorporated in Australia.

Additional investments

Ampol also holds additional investments in a number of associates and joint ventures as set out in Ampol's 2021 Annual Report (Note F3.1). This Statement does not cover actions taken by these associates and joint ventures that Ampol does not control.



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Our operations

Ampol is Australia's leading transport energy business, underpinned by strategic infrastructure and customer positions

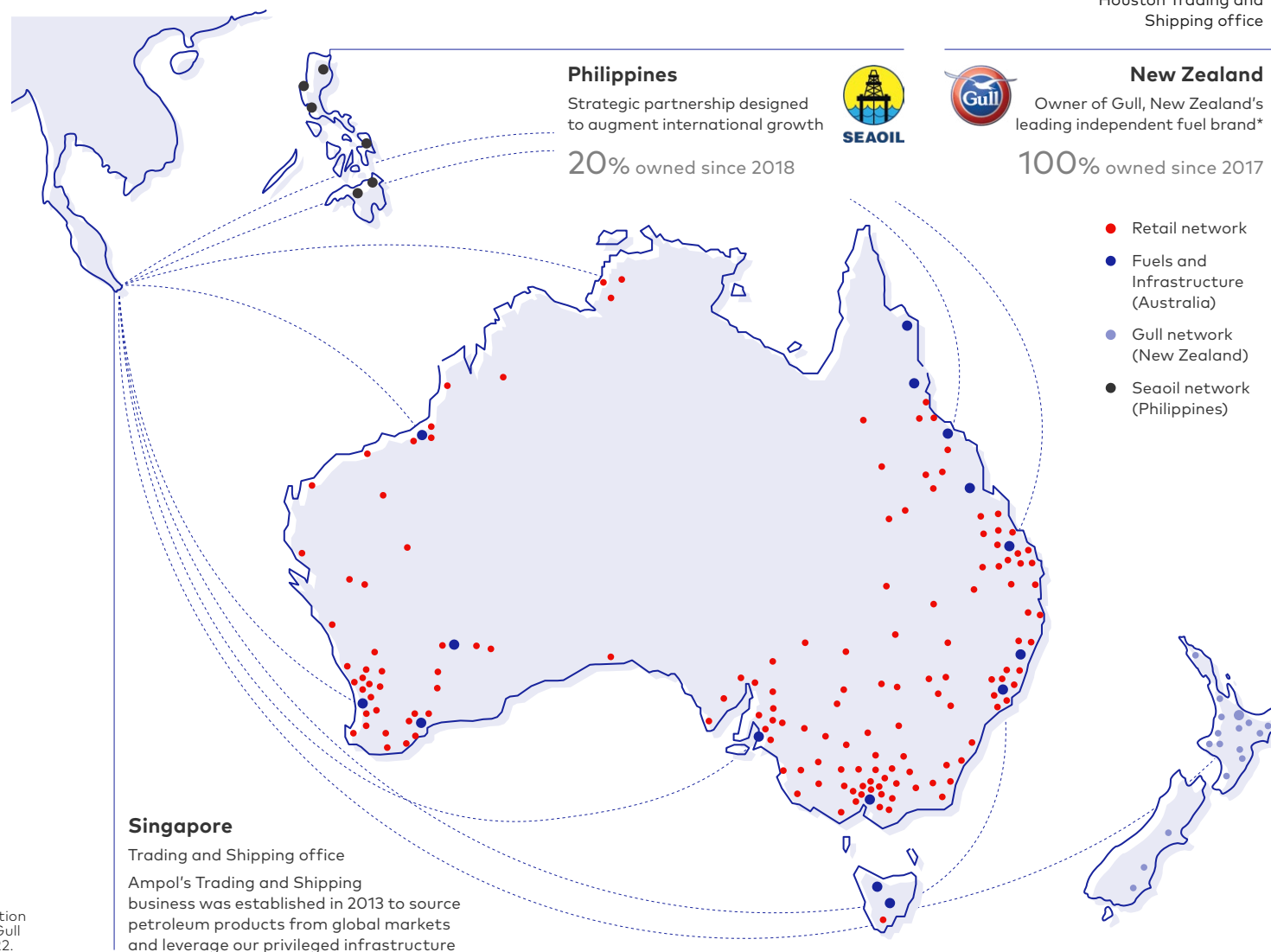
We operate a portfolio of highly strategic assets, including privileged infrastructure located across key demand centres, and have the leading branded retail network with 1,881 sites nationwide.

Our strong infrastructure position is augmented by our supply chain expertise, including a rapidly growing international presence through our trading and shipping operations in Singapore and the United States. In 2021, our trading and shipping business sourced from 20 countries across the globe.

This position and expertise enables us to safely and reliably serve our deep customer base, which is diversified across both wholesale and retail channels. This includes our network of approximately 80,000 business customers, a retail network that serves approximately 3 million customers each week and our market-leading card offer with AmpolCard.

The flexibility and strength of our positions highlight the significant transformational opportunity the energy transition presents for Ampol, and our ability to participate in emerging markets.

* In October 2021, Ampol announced its proposed acquisition of Z Energy, New Zealand's leading fuels distribution and retail business and its intention to divest Gull Energy. The Z Energy acquisition is now complete and the Gull Energy divestment is anticipated to be finalised in the second half of 2022.





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Principal activities

Fuels and Infrastructure



Our Fuels and Infrastructure business sources, imports, refines and distributes fuels and lubricants to a diverse customer base.

~80,000

B2B customers

22.04^{BL}

total sales
volumes in 2021

With capability and scale across the transport energy supply chain, we are one of the leading operators in Australia and an emerging player in the Asian and United States regions.

Our capability in product sourcing, peerless infrastructure and network assets, coupled with our deep customer relationships, allows us to run an integrated business and to drive value from international sourcing through to wholesale supply of fuels and lubricants.

In a competitive and evolving market, Fuels and Infrastructure has transitioned successfully over the past six years from a single market supply function to a long-term growth engine that has delivered increased volumes, capabilities and geographies.

Convenience Retail



Our Convenience Retail business directly operates a network of 684 sites to deliver fuel, lubricants and a range of convenience and essential products to approximately 3 million customers every week.

~3 million

weekly customers at our
company-controlled network

684

company-controlled
retail sites

1,881

sites in branded and AmpolCard-accepting
network, largest in Australia

Through new formats, products, technology and services, we are redefining what convenience means for Australians. Our national network of 684 company-controlled sites delivers customers a premium fuel and card offer through *Amplify* and AmpolCard, with a growing convenience offer that is disrupting the Australian market.

Over recent years, we have evolved our convenience offer to meet the changing needs of customers and to capture the growing convenience market opportunity. This includes the introduction of our *Foodary* and Ampol Woolworths Metrogo formats, and partnerships with Uber Eats as well as quick service restaurant (QSR) partners such as Boost.



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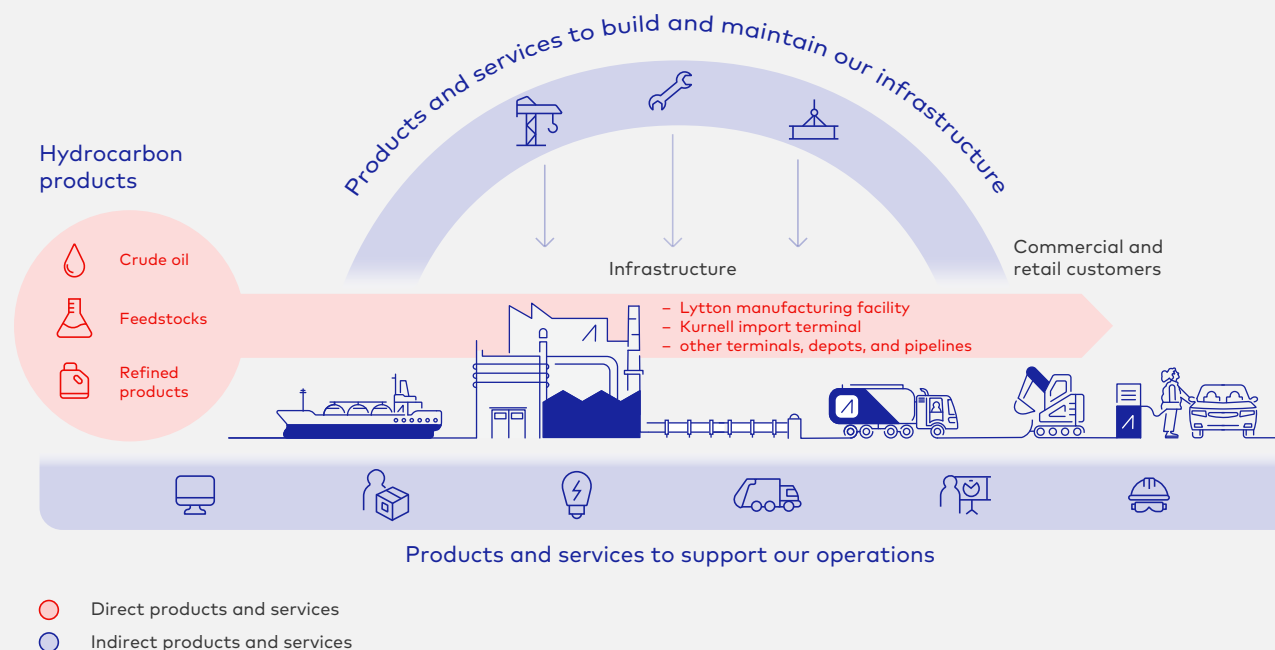
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Our supply chains

Ampol's supply chains include direct products and services for sale to customers, and indirect products and services to support our operations

Fuels and Infrastructure supply chain



Ampol's Fuels and Infrastructure goods and services supply chain starts with the sourcing of hydrocarbon products locally and overseas (crude, feedstocks and refined products, including lubricants).

These products are then shipped or distributed:

- directly to Australian and international business customers;
- to the Lytton refinery for processing; or
- to our broad network of assets (including the Kurnell import terminal, other terminals, depots and pipelines) for storage, distribution and sale in our retail business or to our business and commercial customers.

It also includes the procurement of products and services to build and maintain our infrastructure (for example, industrial painting, electrical and mechanical services), and support services and products (for example, logistics, IT infrastructure, PPE, waste management services and professional services).



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Our supply chains continued

Ampol Group supply chains in 2021

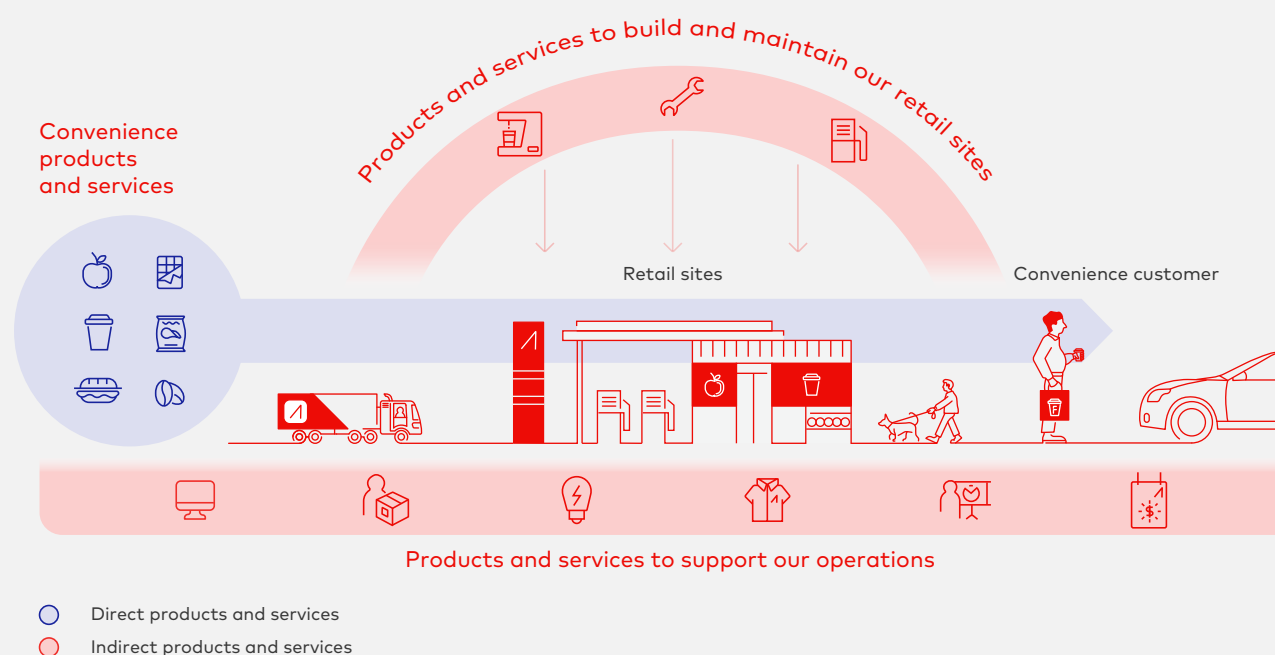
4,000+
Suppliers

93%
Australian suppliers

7%
International suppliers

\$15.48b+
AUD Spend¹

Convenience Retail supply chain



Ampol's Convenience Retail goods and services supply chain includes the sourcing and distribution of convenience products and services for sale to customers (this includes food ingredients for onsite assembly), the procurement of products and services to build and maintain our retail sites (for example, pump systems and shop fittings) and support services and products (for example, logistics, uniforms, IT infrastructure and marketing).

1. Approximate third-party spend excluding taxation and government charges and intercompany transactions.



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Responding to COVID-19

With the continued disruptions felt around the world during the second year of the pandemic, we are reminded of the increased risk of exploitation created by COVID-19 for already vulnerable workers

LOOKBACK

COVID-19 tenure checks

COVID-19 and the associated restrictions continue to impact the shipping industry. Ampol is heavily reliant on shipping and seafarers to move its crude, feedstocks and refined products. Despite the gradual easing of restrictions on international travel, crew changeover continues to pose a challenge as individual countries impose different restrictions on border control. Since April 2020, the Australian Maritime Safety Authority (AMSA) has published several guidance notices aimed at ensuring seafarer health and wellbeing.

In response to AMSA's guidelines, Ampol has put in place additional due diligence steps to ensure it is understood how long each crew member has been on board a ship. For any crew member approaching 11 months of continuous service, Ampol will query their repatriation plan.

Ampol has rejected the use of two vessels, since implementing this additional due diligence requirement. In each case, the ship managers were not able to communicate or adequately confirm repatriation plans. Ampol will not engage with the use of a vessel if it cannot ensure their practises are in line with Ampol's human rights and modern slavery policies.

Ampol charters, on average, 350 vessels per annum and is proud to be championing the cause of fair and safe working conditions for seafarers.



Ensuring safe and reliable supply

Approximately 3 million retail customers per week and approximately 80,000 business customers across Australia depend on Ampol's essential products and services, whether it be fuel, lubricants or convenience products. Ampol's priority during the COVID-19 pandemic has been to ensure the health and safety of our employees, customers and partners, and continuing to reliably supply our products and services.

Impact on vulnerable workers

With ongoing disruptions felt around the world during the second year of the pandemic, we continued to recognise the increased risk of potential exploitation created by COVID-19 for already vulnerable workers, due to interrupted business activities, supply chain pressures, border restrictions, and job losses and insecurity. Throughout the pandemic, Ampol's approach with suppliers has been centred around open communication, in order to understand how COVID-19 and any resulting changes to procurement patterns have impacted them. This approach aimed to navigate the disruptions in a way that achieved satisfactory outcomes for both parties, while also being mindful of the impact these changes would have on workers within the supply chain.

Renewed focus on due diligence

Despite the continued disruption caused by COVID-19, Ampol made significant progress with its modern slavery program. In 2021, a renewed focus on our due diligence program has seen over 50% of our supply base, when measured by spend, complete our Supplier Code of Conduct questionnaire, with verification audits performed on over 80 suppliers. As of 2021, all new suppliers must acknowledge the Supplier Code of Conduct during onboarding and complete the questionnaire prior to onboarding. To assist Ampol staff and contractors to consider the potential actions and mitigations required to reduce modern slavery prior to procuring goods and services, Ampol implemented a specific Modern Slavery Risk Assessment and mitigation procedure during 2021. Despite COVID-19 disruptions, as part of Ampol's Reasonable Steps Program, validation checks at franchise and associated sites continued to plan. Work to improve our contractual updates, grievance mechanisms and specific training also continued.



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Risks of modern slavery practices

We have identified key risk areas within our supply chains and identified areas for prioritisation

Ampol maintains a detailed modern slavery risk assessment of our operations and supply chains and this has led to a better understanding and clarity of modern slavery risks within our organisation, highlighting key areas of potential concern.

The assessment utilised established risk indicators and indices (such as the United States Department of Labor's 2018 List of Goods Produced by Child Labor or Forced Labor and the Global Slavery Index 2018) to identify where there are potential modern slavery risks in our operations and supply chains.

Having identified the initial list of potential risk areas of concern, Ampol continued to ensure due diligence by way of a series of deep dives and establishing an internal deep dive plan.

Prioritisation of deep dives is determined by business divisions, taking into consideration the nature and severity of the potential risk, and Ampol's ability to influence the risk in those areas. See page 15 (Risk area deep dives) for further detail.



This risk assessment identifies several potential risks of modern slavery practices in Ampol's operations and supply chain, arising through:



Procurement of high-risk products for resale or to support business operations

Examples include **coffee** purchased for resale at Ampol retail stores; and **electronics** used by Ampol employees



Procurement of high-risk services

For example, **cleaning services** at Ampol sites



Interactions with high-risk industries

Examples include **shipping**, with Ampol regularly chartering vessels to move its crude, feedstocks and refined products; and **agriculture**, with Ampol selling biofuels, which include agriculture feedstock, as well as fruit and vegetables at its retail stores



Reliance on vulnerable workers

For example, **foreign visa holders** in Ampol's non-company controlled retail sites



Use of high-risk business models

Examples include the use of **guard services** procured through third-party labour-hire arrangements at Ampol sites; and the use of base-skilled **construction labourers**, also procured through third-party labour hire arrangements in significant construction projects



Procurement from high-risk countries

For example, the purchase of **uniforms** manufactured in China and Vietnam, which are products classified as 'at risk of modern slavery' in the Global Slavery Index

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Assessing and addressing modern slavery risk

We maintain a robust corporate governance structure to mitigate modern slavery risks



Governance

We believe adopting a high standard of corporate governance is essential to ensuring modern slavery risks are appropriately managed at Ampol. The following governance structure supports the management of modern slavery risks at Ampol.

Ampol Board

Responsible for corporate governance policies and risk management, including those relevant to modern slavery. Approves relevant policies for publication on the Ampol website and Ampol's Modern Slavery Statement.

Board Safety and Sustainability Committee

Oversees the implementation of Ampol's modern slavery response program.

Ampol Executive Leadership Team (ALT)

Monitors progress of the modern slavery response program.

Legal and governance

Works across the business to coordinate and support delivery of Ampol's modern slavery response program.

Further information on Ampol's corporate governance framework, practices and policies are outlined in our Corporate Governance Statement which is available [here](#).




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Assessing and addressing modern slavery risk continued



Our policies and expectations

Corporate Governance Statement

Ampol is committed to acting lawfully, ethically and responsibly, which plays a critical role in our success as an organisation and our ability to generate shareholder value.

Ampol Values and Code of Conduct

Ampol's approach to modern slavery risks is underpinned by the Ampol Values. The Ampol Code of Conduct defines the standards of conduct and behaviour expected from all employees, directors and officers of the Ampol Group. Ampol also expects external parties, including suppliers and customers, to act in accordance with our Code. The Code sets the foundation which defines Ampol's expectation of its people and includes a firm commitment to supporting the fundamental principles of human rights as expressed in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. The Ampol Code of Conduct confirms Ampol does not tolerate any form of slavery or child labour, including forced labour, and acknowledges that in order to respect human rights, Ampol needs to manage any adverse human rights impacts which we may cause, contribute to or be linked to.

The Ampol Code of Conduct applies across the Ampol Group and can be accessed [here](#).



Ampol Supplier Code of Conduct

Our respect for human rights provides the basis for our expectations of ourselves and for our counterparties. These expectations are set out in the Ampol Supplier Code of Conduct and include Ampol's expectations around labour and human rights. This includes the expectations that counterparties will:

- ensure all work is freely chosen without the use of modern slavery, including forced or compulsory labour;
- ensure workers are of legal age, preventing any form of child labour;
- pay their workers lawful wages; and
- provide fair working conditions for employees.

The principles outlined in Ampol's Supplier Code of Conduct apply to all third-party suppliers, contractors, trading and business partners and service providers (Suppliers) and their employees who transact with or provide any goods or services to Ampol.

The Ampol Supplier Code of Conduct can be accessed [here](#).



Ampol Human Rights Policy

Ampol has enshrined its commitment to conducting its business in a manner that respects human rights in its Human Rights Policy. The Ampol Human Rights Policy calls out focus areas where respect for human rights is most critical to the way we operate including:

- considering human rights and setting minimum expectations as part of sourcing and purchasing decisions; and
- providing a safe, secure and inclusive work environment free from discrimination, bullying and harassment, together with fair pay and labour conditions.

The Ampol Human Rights Policy applies to the Ampol Group and can be accessed [here](#).





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Supplier engagement

Ampol Supplier Code of Conduct compliance

The Ampol Supplier Code of Conduct sets out the minimum expectations of counterparties across the key areas of labour and human rights, diversity and inclusion, health and safety, environment and sustainability, and ethical procurement. In 2019, Ampol commenced proactive engagement with suppliers to assess their compliance with the expectations set out in the Code through a supplier questionnaire administered via Ampol's supplier risk management platform – Informed 365. The questionnaire allows Ampol to identify gaps in a counterparty's ability to comply with the expectations set out in the Code and address these gaps. With renewed focus in 2021, over 50% of Ampol's supply base, by spend, have now completed the questionnaire with over 80 desktop verification assessments also completed.

Our expectations are communicated to suppliers through making the Code available publicly, the Supplier Code of Conduct supplier questionnaire, contractual agreements or when registering for tenders.

As of 2021, all new suppliers must acknowledge the Code during onboarding and complete the supplier questionnaire prior to onboarding.

FUTURE ACTION

We will work to further embed Supplier Code of Conduct compliance measures into business-as-usual processes with a target of 80% of our supply base to complete the supplier questionnaire and a minimum of 100 verification assessments to be completed in 2022.

Contractual clauses and tender questions

To strengthen Ampol's management of modern slavery risks present through counterparty relationships, we have updated all precedents to include requirements around our Supplier Code of Conduct and added clauses that specifically relate to modern slavery. This includes requirements to:

- comply with modern slavery laws and not engage in modern slavery;
- maintain relevant policies and procedures;
- take reasonable steps to reduce the risk of modern slavery in the supply chain; and
- assist Ampol with its due diligence procedures that are aimed at reducing modern slavery risk in its supply chains.

Since 2020, Ampol has leveraged a sourcing platform that streamlines Ampol's tender process for material tenders. A mandatory question relating to how a supplier manages modern slavery risks has been embedded in the tender platform to ensure that engagement with counterparties on modern slavery risks commences early on.

FUTURE ACTION

We will continue to transition existing suppliers upon renewal of their contracts to updated precedents and clauses where appropriate in bespoke agreements.

In 2021, Ampol implemented a Modern Slavery Risk Assessment and Mitigation Procedure to consider the potential actions and mitigations prior to procuring goods and services.





Assessing and addressing modern slavery risk continued

Risk area deep dives

As set out on page 11 (Risks of modern slavery practices), one outcome of the initial risk assessment was the identification of several potential modern slavery risk areas which were prioritised for ongoing deep dives.

The deep dives were undertaken using a combination of some or all of the following:

- detailed discussions with internal subject matter experts;
- detailed modern slavery questionnaires, administered via Ampol's supplier risk management platform, Informed 365, which was sent to a selection of suppliers;
- meetings with suppliers to engage specifically on the issue of modern slavery; and
- implementation of our new Modern Slavery Risk Assessment and Mitigation Procedure.

Insights from the deep dives are used to inform our approach to modern slavery risk in these areas and have allowed Ampol to identify additional mitigation steps.

These additional mitigations steps include activities such as targeted training and the use of modern slavery contractual clauses.

FUTURE ACTION

Embed the Modern Slavery Risk Assessment and Mitigation Procedure and continue to identify risk areas for ongoing deep dive assessments.

Deep dives undertaken in

19

areas of Ampol's supply chain

>50%

of Ampol's supply base, by spend, have completed the supplier code of conduct questionnaire

The deep dives and detailed modern slavery questionnaires have provided Ampol with better visibility on the nature of the risks in the various parts of Ampol's operations and supply chains, and what Ampol and its suppliers are doing to manage these risks.

CASE STUDY

Signage for the rebrand to Ampol

Our convenience retail sites in Australia have recently rebranded to Ampol, with 880 sites rebranded by the end of 2021. Ampol's risk assessment identified signage to be a potential risk area, with the products being manufactured offshore and in a location considered to be higher risk in the 2018 Global Slavery Index. As part of the deep dive, Ampol worked with the selected supplier to understand what processes they had in place to mitigate the modern slavery risks. The supplier advised us that they complete regular audits of their factories as part of a contractual arrangement with another key customer.

Throughout the deep dive, it was noted that whilst these audits were being completed for other customers, we were unable to validate the previous audit data points as this was governed by the supplier's key customer.

To ensure compliance with Supplier Code of Conduct and modern slavery requirements, the supplier initiated a third party audit of the factories used to manufacture Ampol's signage equipment. The audit did not uncover any major modern slavery risks. Overall, the supplier was open and transparent throughout the whole process and showed that their organisation held modern slavery risks at the forefront of their global operations.





Assessing and addressing modern slavery risk continued

Specific risk mitigation for targeted higher risk areas

Entry-level workers at non-company controlled sites

While not directly part of Ampol's operations, Ampol recognises the potential risk of exploitation of base-skilled workers employed as shop assistants throughout its associated retail sites, which are not company controlled. This workforce includes vulnerable workers, such as foreign students with limited working rights, and migrant workers, who may have limited understanding of their rights or how to enforce them. Ampol does not have control over the working conditions of employees within the extended network. However, Ampol has a workplace compliance program (Reasonable Steps Program) whereby Ampol takes steps to help ensure fair and legal treatment of workers employed throughout its associated retail sites.

Franchise sites

Within Ampol's franchise network, the Reasonable Steps Program includes:

- contractual obligations to comply with workplace laws;
- workplace compliance audits;
- a phone advice line where franchisees can call and get free advice on first level support for human-resources related matters on a confidential basis; and
- access to a dedicated hotline for employees wishing to raise wage or visa non-compliance concerns confidentially.

Since the program commenced, approximately 430 sites have been audited, and appropriate remediation action taken where issues were identified.

Since 2018, Ampol has been transitioning franchise sites to company operations, which has resulted in a significant reduction in the risk of exploitation within this part of the network, with Ampol now controlling working conditions. At the end of 2021, only eight franchise sites remained, all of which have been audited as part of the program at least once.

FUTURE ACTION

In 2022, all franchised sites remaining in the network will be audited for workplace compliance. An internal audit of the Reasonable Steps Program (for both Franchise and Associated sites) will also be completed in 2022.

Associated sites (other than franchise sites)

Ampol's Reasonable Steps Program, as it applies to associated retail sites in Australia other than franchise sites, includes:

- contractual obligations to comply with workplace laws;
- workplace law compliance validation checks;
- access to education and practical assistance relating to compliance with workplace obligations; and
- a dedicated hotline for employees wishing to raise wage or visa non-compliance concerns confidentially.

Since 2018, when this program commenced, 40 associated retail site operators have undergone a validation check and appropriate remediation action taken where issues were identified. Validation checks were completed at 17 sites in 2021.

FUTURE ACTION

15 associated sites scheduled for validation checks in 2022.





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Seafarer welfare

In recognition of seafarers' particular vulnerability to exploitation, Ampol utilises a vessel-vetting process to ensure counterparties moving its crude, feedstocks and refined products by ship provide fair and safe working conditions for their crew.

World Check

Using World Check, a third-party due diligence screening tool, all vessel owners are screened for instances of adverse media or litigation (including those relating to modern slavery) prior to onboarding, and on a continuous basis after being approved.

OCIMF inspection reports

All vessels are checked for a current Oil Companies International Marine Forum (OCIMF) vessel inspection report, which focuses on safe operations and safety measures, including where these relate to the crew.

MLC certification

All vessels are checked for a current Maritime Labour Convention certificate, covering issues set out in the Maritime Labour Convention 2006, including protection at work, living conditions, employment, health, social security and related issues.

PSC inspections

Port State Control (PSC) reports (which check compliance with the Maritime Labour Convention 2006) from the previous 12 months are reviewed for all vessels to identify issues and avoid using vessels detained by the PSC due to unsatisfactory crew conditions.

COVID-19 tenure checks

For shipping vessels, additional checks were introduced following the onset of COVID-19 for all vessels to assess crew time on board. See case study on page 10 (COVID-19 tenure checks).

Financial standing

A significant risk for ship crew is posed in the event a vessel owner goes bankrupt and abandons the ship and its crew. Ampol conducts credit checks on all vessel owners to mitigate this risk.

ITF ship lookup

Administered by the International Transport Workers' Federation (ITF), the lookup provides a succinct overview of any concerns identified by the last ITF inspection conducted on board. Where an ITF inspection uncovers problems, including but not limited to low wages, sub-standard living conditions and general employment issues, clarification and further information can be obtained from the vessel's technical operator. The ITF lookup is not an industry-wide practice for vessel clearance and something Ampol elects to do to provide additional assurance.

FUTURE ACTION

We will continue to assess and review the risk of modern slavery for seafarers in our supply chain.





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Assessing and addressing modern slavery risk continued

Grievance mechanisms

Grievance mechanisms provide a direct channel of communication between individuals adversely impacted and Ampol.

They provide a way for Ampol to monitor whether its activities are causing, contributing, or directly linked to worker exploitation, and to address such adverse impacts if they are identified.

Ampol is committed to ensuring anyone coming forward with concerns based on reasonable grounds is treated fairly.

Ampol's Grievance Resolution Policy

Ampol's Grievance Resolution Policy provides the mechanism for employees to raise workplace grievances, including issues relating to their working conditions, and have these issues addressed in line with the Ampol Values and Code of Conduct.

Whistleblower Policy

Ampol has a Whistleblower Policy, which establishes a framework for Ampol to comply with obligations regarding whistleblowers, including legal protections provided by law for whistleblowers. The Whistleblower Policy is designed to protect and encourage our employees, and those external to Ampol with close knowledge of our operations (including employees of suppliers), to report misconduct, including behaviour that is unethical, corrupt or illegal, without fear of retaliation.

Ampol Hotline

Ampol's grievance mechanisms are supported by an independently run confidential Hotline, which is open to Ampol employees, as well as individuals outside Ampol who have knowledge of misconduct relating to Ampol. The Hotline allows reports to be made anonymously, and for such matters to be managed and documented securely. Reports made to the Hotline trigger a process within Ampol to assess the report and take further steps, including investigation and remediation if appropriate in the circumstances. Reports made to the Ampol Hotline are monitored and reported to the Executive General Manager Governance and Risk and the General Manager Group Audit and Risk on a monthly basis and the Board and Human Resources Committee on a six-monthly basis.





Assessing and addressing modern slavery risk continued

Training

Ampol employees are trained on Ampol's Code of Conduct obligations and expectations every two years, using a mandatory online training module.

They are also required to acknowledge and agree to the Ampol Code of Conduct when onboarding. Breaches of the Ampol Code of Conduct can be reported through human resources, a person's manager or the Ampol Hotline, and are monitored and reported to the Board and Human Resources Committee on a six-monthly basis.

In addition, groups of employees who require a more detailed understanding of Ampol's modern slavery risks are identified for modern slavery training. This includes employees within human resources, procurement and business functions responsible for areas with heightened potential risk. In 2021, three additional functions responsible for areas with heightened potential risk were identified and trained.

Training includes topics such as:

- modern slavery and its prevalence in Australia and globally;
- why Ampol needs to appropriately manage modern slavery risks;
- how Ampol manages modern slavery risks;
- what individuals at Ampol can do to manage these risks; and
- how to recognise potential indicators of modern slavery.


Training sessions were used as an opportunity for dialogue to better understand modern slavery risks and management within specific business functions, thereby serving to both upskill employees and deepen Ampol's understanding of the issue.

FUTURE ACTION

We will continuously review the Ampol Code of Conduct training to identify opportunities to strengthen employee awareness of modern slavery risks and grievance mechanisms. We will also continue to review the employee groups that require targeted modern slavery training.



As at the end of 2021

~98% 

of Ampol employees had completed Code of Conduct training within the previous two years

~110 employees

have completed modern slavery training in the past two years encompassing twelve different business functions

Training sessions were used as an opportunity for dialogue to better understand modern slavery risks and management.

Assessing effectiveness and consultation

As we mature our modern slavery response program, we will look to improve our measurements of effectiveness

Ampol assesses the effectiveness of the actions it takes in a number of ways

- **Governance:** Feedback and assessment from the Board, Safety and Sustainability Committee and ALT on the implementation and progress of Ampol's modern slavery response program.
- **ARMF:** The status and effectiveness of control measures relating to modern slavery risks are assessed via Ampol's ARMF risk assessment process.
- **Policies:** Periodic scheduled reviews of relevant policies, including the Ampol Human Rights Policy.
- **Supplier Code of Conduct compliance:** Monitoring the number of suppliers who acknowledge Ampol's Supplier Code of Conduct, the number of suppliers who complete the Supplier Code of Conduct supplier questionnaire and the number of verification assessments completed.

- **Contract clauses and tender questions:** Monitoring the number of precedents updated to include relevant modern slavery clauses, and the number of tenders including modern slavery questions and responses.
- **Training:** Monitoring the number of individuals trained.
- **Grievance mechanisms:** Monitoring Ampol's grievance mechanisms to identify trends and issues raised.
- **External engagement:** External engagement with forums, peers and experts in the field to understand best practice and emerging information relating to modern slavery.

As we mature our modern slavery response program, we will look to improve our measurements of effectiveness.

Consultation with owned or controlled entities, including reporting entities

In implementing Ampol's modern slavery response program, Ampol has continued to consult with key stakeholders from relevant parts of Ampol's business. This includes consultation with functions which operate across the Ampol Group (including legal, procurement and human resources) as well as targeted operational functions.

Modern slavery consultation sessions were also conducted with a number of Ampol subsidiary boards, and similar sessions convened with subsidiary directors and other key leaders for each of Ampol's Fuels and Infrastructure and Convenience Retail businesses.

Directors and key leaders from the three additional joint reporting entities (Ampol Australia Petroleum Pty Ltd, Ampol Retail Pty Ltd and Ampol Petroleum Distributors Pty Ltd) were captured in this consultation process.

In addition, prior to approval by the Ampol Limited Board, this statement was reviewed by:

- key members of the ALT responsible for the overall management of the Ampol Group and implementation of its strategy; and
- the directors of Ampol Australia Petroleum Pty Ltd, Ampol Retail Pty Ltd and Ampol Petroleum Distributors Pty Ltd.

Consultation with investments

This statement covers actions being taken by entities owned or controlled by Ampol. Investments in associates and joint ventures which are not controlled by Ampol are approached in a similar manner as suppliers. The risks in relation to these entities are assessed and prioritised in the context of other Ampol group modern slavery risk categories. Ongoing engagement with these entities on modern slavery risks occurs based on the risk profile, priority ranking and nature of the relationship with Ampol of the particular investment.



Other relevant information and approval process

Meaningful change and an effective solution require collaboration

We recognise that modern slavery is a complex problem with a web of multiple and interconnected root causes and influences. Businesses alone cannot eradicate the problem.

Meaningful change and an effective solution require collaboration with governments, the private sector and civil society, as well as a focus on addressing the problems that contribute to modern slavery, such as poverty, lack of equal education opportunities and access to fair work opportunities.

Commitments and collaboration

Since October 2020, we have further strengthened our commitment to operating our business in a manner that respects human rights by becoming a participant of the United Nations Global Compact and a signatory to the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption, which include the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

This allows us to participate in the Global Compact Network Australia's Modern Slavery Community of Practice meetings. These meetings are aimed at discussing the most pressing challenges and obstacles facing Australian business with respect to managing and communicating modern slavery risks and discussing good practice in responding to these challenges.

Ampol's approach to modern slavery eradication continues to be collaborative, including reaching out to others to share knowledge.

Addressing the root causes of modern slavery

The Ampol Foundation, established in 2019, is the vehicle through which Ampol delivers its corporate social responsibility activities. The focus of the Foundation is to ensure our activities have proven social impact, make a meaningful difference and align with our company purpose of *Powering better journeys, today and tomorrow*. A major focus of the Foundation in 2021 has been to champion education and employment opportunities for Australian youth and keeping communities safe.

Reducing inequality and ensuring fair employment opportunities and quality education for all Australians will contribute to creating the underlying social infrastructure needed to eradicate modern slavery. Further information on the work of the Ampol Foundation is set out in Ampol's 2021 Sustainability Report.

Approval process

This statement was reviewed and approved by the Board of Directors of Ampol Limited on 20 June 2021. The Ampol Board of Directors will review and update this statement on an annual basis.



Matthew Halliday
Managing Director and CEO

FUTURE ACTION

Ampol will seek to identify additional opportunities to collaborate with others and participate in modern slavery forums.

